

ORIGINAL

ChiWong.Sup.Ind

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FILED
DISTRICT COURT OF GUAM

FEB 16 2005 *mba*

MARY L.M. MORAN
CLERK OF COURT

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF GUAM

UNITED STATES OF AMERICA,)

Plaintiff.)

vs.)

CHI WAH WONG,)

Defendant.)

CRIMINAL CASE NO. 05-00003

SUPERSEDING INDICTMENT

ALIEN SMUGGLING

[8 U.S.C. § 1324(a)(2)(B)(ii)

and 18 U.S.C. § 2, and

6 U.S.C. §§ 251 & 557]

(Counts 1-3)

THE GRAND JURY CHARGES:

COUNT ONE

On about December 29, 2004, within the District of Guam and elsewhere, the defendant, CHI WAH WONG, knowingly or in reckless disregard of the fact that an alien did not receive prior official authorization to come to, enter or reside in the United States, did bring and attempt to bring to the United States an alien for the purpose of commercial advantage and private financial gain, to wit: Duan Li to the Guam International Airport, in violation of Title 8, United

1 States Code, Section 1324(a)(2)(B)(ii) and Title 18, United States Code, Section 2, and Title 6,
2 United States Code, Sections 251 and 557.

3 **COUNT TWO**

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5 On about December 29, 2004, within the District of Guam and elsewhere, the defendant,
6 CHI WAH WONG, knowingly or in reckless disregard of the fact than an alien did not receive
7 prior official authorization to come to, enter or reside in the United States, did bring and attempt
8 to bring to the United States an alien for the purpose of commercial advantage and private
9 financial gain, to wit: Jian Feng Chen to the Guam International Airport, in violation of Title 8,
10 United States Code, Section 1324(a)(2)(B)(ii) and Title 18, United States Code, Section 2, and
11 Title 6, United States Code, Sections 251 and 557.
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COUNT THREE

On about November 14, 2004, within the District of Guam and elsewhere, the defendant, CHI WAH WONG, knowingly or in reckless disregard of the fact than an alien did not receive prior official authorization to come to, enter or reside in the United States, did bring and attempt to bring to the United States an alien for the purpose of commercial advantage and private financial gain, to wit: Jian Qin Chen to the Guam International Airport, in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii) and Title 18, United States Code, Section 2, and Title 6, United States Code, Sections 251 and 557.

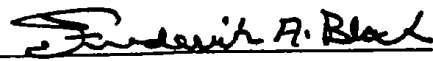
Dated this 16 day of February, 2005.

A TRUE BILL.




Foreperson

LEONARDO M. RAPADAS
United States Attorney
Districts of Guam and NMI

By: 
FREDERICK A. BLACK
Assistant U.S. Attorney

Approved:


RUSSELL C. STODDARD
First Assistant U.S. Attorney